

ASIA ECONOMIC INSTITUTE, a  
California LLC; RAYMOND  
MOBREZ an individual; and  
ILIANA LLANERAS, an individual,

Plaintiffs,

vs.

XCENTRIC VENTURES, LLC, an  
Arizona LLC, d/b/a as  
BADBUSINESS BUREAU and/or  
BADBUSINESSBUREAU.COM  
and/or RIP OFF REPORT and/or  
RIPOFFREPORT.COM; BAD  
BUSINESS BUREAU, LLC,  
organized and existing under the  
laws of St. Kitts/Nevis, West Indies;  
EDWARD MAGEDSON an  
individual, and DOES 1 through  
100, inclusive,

Defendants.

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Case No.: 2:10-cv-01360-SVW-PJW

**DECLARATION OF PATRICIA  
BRAST**

I, Patricia Brast, declare under penalty of perjury as follows:

1. My name is Patricia Brast. I am a resident of the State of Texas, not a party to this action, am over the age of 18 years, and if called to testify before this Honorable Court or in another proceeding I could and would give the following testimony which is based on my own personal knowledge unless otherwise stated.

2. From approximately 2004 to November 2009, I operated The Anabelle Mansion on Sunset Ranch, at 629 John Charles Drive, Burleson, Texas. The Anabelle Mansion is an approximately 10,000 square-foot building located on

an approximately 17.5 acre estate in the greater Dallas-Forth Worth, Texas area. I keep it in pristine condition.

3. From approximately 2004 to November 2009, I had a business hosting weddings at The Anabelle Mansion. I started the business to give fairy-tale weddings to brides. This was my passion and dream. I call the brides who have weddings at The Anabelle Mansion "Anabelle Angels."

4. While The Anabelle Mansion was in business, I hosted approximately 150 weddings there. The average wedding generated sales of approximately \$30,000 each.

5. In or around July 2008, I first learned that The Anabelle Mansion at Sunset Ranch was the subject of a Ripoff Report. Attached as "**Exhibit 1**" is a true and correct copy of the report at RipoffReport.com about The Anabelle Mansion at Sunset Ranch. It has the headline "BRIDES BEWARE!!" It says that the house is nice, but says very nasty things about me personally that would cause a bride not to want to do business with me.

6. When someone searches Google for "Anabelle Mansion at Sunset Ranch," the first thing they see is "BRIDES BEWARE!!." They do not see my rebuttal or anything positive. Attached as "**Exhibit 2**" is a true and correct copy of the top page of Google search results for "Anabelle Mansion at Sunset Ranch." The number one search result for my former business is as follows:

"Annabelle Mansion At Sunset Ranch Review | Rip-off Report #356574  
5:05pm Jul 28, 2008 ... Annabelle Mansion At Sunset Ranch **BRIDES**  
**BEWARE!!** Burleson Texas. [www.ripoffreport.com/.../annabelle-mansion.../annabelle-mansion-at-sunset-ra-p279b.htm](http://www.ripoffreport.com/.../annabelle-mansion.../annabelle-mansion-at-sunset-ra-p279b.htm)"

Exhibit 2 (emphasis added).

7. After the Ripoff Report went up about my business, I saw the expression and attitude in my brides' eyes change. It is difficult to describe, but I just knew that some of them had seen the Ripoff Report about The Anabelle Mansion. I saw the doubt in the brides' eyes. What bothered me the most was that having the Ripoff Report up took a bride that was happy and gave her doubts. It took what should have been a happy memory of a special day and tarnished it forever.

8. After that, it became difficult to host weddings at The Annabelle Mansion. I asked the Ripoff Report for help, but they said I could file a rebuttal.

9. I responded to someone who emailed me claiming they could have the negative report taken down for a fee of approximately \$499. I paid it. The report seemed to disappear temporarily, but then reappeared. I paid another fee of approximately \$599 to have a second report taken down. I could not successfully have the reports permanently removed.

10. I also tested out the RipoffReport.com website to see if someone could submit a positive report about my business. When I tried to submit a positive report, as a test, I received a message in response saying a positive report could not be posted but I could post it as a comment or a reply. The problem with that is that the comments and replies are very small and at the bottom of the web page, whereas the negative report itself is in bigger type and at the top.

11. I also turned to the media for help. Byron Harris of WFAA, an ABC affiliate in Dallas-Forth Worth did a television news story about The Anabelle Mansion and Ripoff Report on or about January 16, 2009. Attached hereto as



“Exhibit 3” is the transcript of the television news story about this. The video can also be seen on the web at

[http://www.projo.com/sharedcontent/dws/wfaa/bharris/stories/wfaa090115\\_mo\\_ri\\_poffreport.8a6931c.html](http://www.projo.com/sharedcontent/dws/wfaa/bharris/stories/wfaa090115_mo_ri_poffreport.8a6931c.html). The parts of that video about me and my experiences is accurate.

12. I reluctantly decided to shut down the business and I am trying to sell The Annabelle Mansion. The RipoffReport.com website took a business I spent millions of dollars on and destroyed it.

13. The stress of this experience dramatically affected my health. I developed a thyroid problem and other health related problems. I have gained approximately thirty pounds. My husband does not like the lies that are written about ~~him~~<sup>me</sup> on ripoffreport.com.

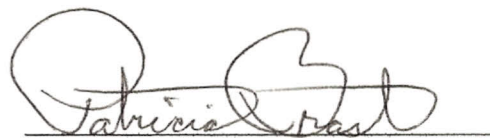
14. I have lost my passion for helping brides have their dream weddings at The Annabelle Mansion. The brides don't want the name of their wedding venue to be associated with anything bad. I see the doubt in their eyes, and a bride shouldn't have doubts.

15. I contacted a few lawyers, but they did not have the specialty or experience to know how to handle this.

16. I do not want to leave The Anabelle Mansion, but my business has been destroyed. I am currently trying to sell The Anabelle Mansion as a private residence.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED ON: June 11, 2010, at Burleson, Texas.

A handwritten signature in cursive script, appearing to read "Patricia Brast", written over a horizontal line.

Patricia Brast